

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

SHERI WADE

Plaintiff,

v.

INTERWORKS UNLIMITED, INC.

Defendant.

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Case No. 3:18cv828 (MHL)

**PLAINTIFF’S SUPPLEMENTAL WITNESS & EXHIBIT LIST FOR HEARING ON
PLAINTIFF’S THIRD MOTION FOR DEFAULT JUDGMENT**

Plaintiff Sheri Wade (“Ms. Wade”), by counsel, hereby submits her witness and exhibit list to the Court in preparation for the November 23, 2021, hearing on Plaintiff’s Third Motion for Default Judgment:

WITNESS LIST

Ms. Wade will call the following witnesses during the November 23, 2021, hearing:

1. Sheri Wade, Plaintiff;
2. Derrick Wade, Plaintiff’s Husband;
3. Vonita Crawley, witness;
4. Elliot Skorupa, MSEP (Master’s Degree in Exercise Physiology); and
5. Andrew Bogle, M.D., via video (*de bene esse* deposition).¹

In the interests of judicial economy, Plaintiff originally intended to offer Dr. Bogle’s testimony through video deposition. However, given the unique situation presented by this case and the uncertain interplay with Federal Rule of Civil Procedure 32, Plaintiff will seek leave of

¹ Plaintiff will include a USB flash drive containing the video deposition of Dr. Bogle in the exhibit binders submitted to the Court.

Court to present the video deposition. Should the Court rule that presentation of the video deposition is improper under these unique circumstances, Plaintiff will endeavor to procure Dr. Bogle's presence for the November 23, 2021, hearing.

EXHIBIT LIST

Ms. Wade will make use of the following exhibits during the November 23, 2021, hearing:

A. Deposition Transcript of Dr. Bogle;

B. Exhibits to Dr. Bogle's Deposition:

1. Exhibit B1: Picture Board – x-rays
2. Exhibit B2: Picture Board – x-rays
3. Exhibit B3: Statement of Damages
4. Exhibit B4: St. Francis Medical Center – Billing
5. Exhibit B5: Richmond Emergency Physicians – Billing
6. Exhibit B6: Commonwealth Radiology – Billing
7. Exhibit B7: OrthoVirginia Patient Ledger – Billing
8. Exhibit B8: Commonwealth Anesthesia – Billing
9. Exhibit B9: Boulders Ambulatory Surgery Center – Billing
10. Exhibit B10: Physical Therapy Solutions LP – Billing
11. Exhibit B11: Centers for Work Performance Functional Capacity Evaluation;

C. Dr. Bogle's Surgery Records: January 8, 2017;

D. Dr. Bogle's Surgery Records (Removal of Hardware): September 14, 2017;

E. Photographs of the injury:

1. Exhibit E1: Photograph of Plaintiff's Left Arm & Wrist;

2. Exhibit E2: Photograph of Plaintiff's Left Arm Post-Surgery;
3. Exhibit E3: Photograph of Plaintiff's Left Arm Post-Surgery;
4. Exhibit E4: Photograph of Plaintiff's Left Arm Post-Surgery;
5. Exhibit E5: Photograph of Plaintiff's Left Wrist;
6. Exhibit E6: Photograph of Plaintiff in Hardware Post-Surgery; and
7. Exhibit E7: X-Ray of Plaintiff's Arm Following Installation of Hardware.

Plaintiff's medical bills presently total more than \$275,000.00. Based on her medical bills, pain and suffering and other damages, Plaintiff will request a damages award of \$2,000,000.00 for compensatory damages, attorneys' fees pursuant to Virginia Code § 59.1-206, and pre-judgment and post-judgment interest.

DATE: November 12, 2021

Respectfully submitted,

SHERI WADE

By: _____ /s/
Counsel

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